

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE FOREIGN EXCHANGE
BENCHMARK RATES ANTITRUST
LITIGATION

ECF CASE

No. 1:13-cv-07789 (LGS)

**NOTICE OF UNOPPOSED MOTION FOR ISSUANCE OF LETTER OF REQUEST FOR
INTERNATIONAL JUDICIAL ASSISTANCE, APPOINTMENT OF COMMISSIONER,
AND DIRECTION OF SUBMISSION OF HAGUE CONVENTION APPLICATION**

PLEASE TAKE NOTICE that upon the Declaration of James R. Warnot, Jr., dated January 24, 2017, and the exhibits annexed thereto (the “Warnot Declaration”), the undersigned attorneys for Defendant Société Générale (“SG”) in the above-captioned matter will move this Court, before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Centre Street, Courtroom 1106, New York, New York 10007, on such date and at such time as the Court may direct, for an Order:

- (1) Issuing a Letter of Request for International Judicial Assistance (“Request for Assistance”) pursuant to 28 U.S.C. § 1781 and Chapters I and II of the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters, T.I.A.S. No. 7444, 23 U.S.T. 2555 (the “Hague Convention”) in the form attached as Exhibit B to the Warnot Declaration;
- (2) Appointing Alexander Blumrosen as commissioner (“Commissioner”) pursuant to Article 17 of the Hague Convention, pending the approval of the French Ministère de la Justice, to (a) receive from SG its French-originated documents that are responsive to (i) Plaintiffs’ First Request for Production of Documents to Société Générale S.A., dated June 7, 2016, and (ii) Plaintiffs’ Second Set of Requests for

Production of Documents to Non-Settling Defendants, dated June 7, 2016

(“Documents”); (b) transmit the Documents to counsel for Plaintiffs and SG pursuant to Article 17 of the Hague Convention and in performance of his appointment as Commissioner and duties thereunder; and (c) upon completion to inform the French Ministère de la Justice;

(3) Directing submission of the Order and Letter of Request for Assistance to the French Ministère de la Justice, for the purpose of approving the appointment of the Commissioner;

(4) Granting the additional relief set forth in the Order; and

(5) Granting such other and further relief as this Court may deem just and proper.

A Proposed Order is attached as Exhibit A to the Warnot Declaration. As reflected in the Warnot Declaration, Plaintiffs do not oppose this motion.

Dated: New York, New York
January 24, 2017

Respectfully submitted,

Linklaters LLP

By: /s/ James R. Warnot, Jr.

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